



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706 • (208) 373-0502

Dirk Kempthorne, Governor
Toni Hardesty, Director

June 14, 2006

Certified Mail No. 7005 1160 0000 1550 4311

Alan Hieb, Plant Manager
The Amalgamated Sugar Company
P.O. Box 700
Paul, Idaho 83347

RE: Facility ID No. 067-00001, The Amalgamated Sugar Co. (TASCO), MiniCassia
Final Permit Letter

Dear Mr. Hieb:

The Idaho Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-060404 to TASCO, in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho).

This permit is based on your permit application received on February 9, 2006. This permit is effective immediately and replaces PTC No. P-050421, issued December 15, 2005, the terms and conditions of which no longer apply. This permit does not release TASCO from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

Please beware that you may operate the source so long as it does not violate terms or conditions of your existing Tier I operating permit. You may request at anytime that the permit to construct provisions be incorporated into the Tier I operating permit through an administrative amendment in accordance with the Rules for the Control of Air Pollution in Idaho (IDAPA 58.01.01.381). When the Tier I operating permit is issued you may operate in accordance with its provisions.

A representative of the Twin Falls Regional Office will contact you regarding a meeting with DEQ to discuss the permit terms and requirements. DEQ recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to call Bill Rogers at (208) 373-0502 to address any questions or concerns you may have with the enclosed permit.

Sincerely,

Martin Bauer, Administrator
Air Quality Division

MB/ABC/bf

Permit No. P-060404

Enclosures

c: **Bill Allred, Twin Falls Regional Office**
 Bill Rogers, Permit Coordinator
 Almer Casile, Permit Writer
 Marilyn Seymore/ Pat Rayne, Air Quality Division
 Laurie Kral, US EPA Region 10
 Permit Binder
 Source File
 Phyllis Heitman (Ltr Only)
 Reading File (Ltr Only)



**Air Quality
PERMIT TO CONSTRUCT**

**State of Idaho
Department of Environmental Quality**

PERMIT No.: P-060404

FACILITY ID No.: 067-00001

AQCR: 63

CLASS: A

SIC: 2063

ZONE: 12

UTM COORDINATE (km): 274.0, 4712.0

1. PERMITTEE

The Amalgamated Sugar Company LLC

2. PROJECT

Increase Annual Beet Slice Limit – Permit Modification

3. MAILING ADDRESS

Box 700

CITY

Paul

STATE

ID

ZIP

83347

4. FACILITY CONTACT

Alan Hieb

TITLE

Plant Manager

TELEPHONE

(208) 438-2115

5. RESPONSIBLE OFFICIAL

Alan Hieb

TITLE

Plant Manager

TELEPHONE

(208) 438-2115

6. EXACT PLANT LOCATION

50 S. 500 W., Paul, Idaho

COUNTY

Minidoka

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Sugar beet processing

8. GENERAL CONDITIONS

This permit is issued according to IDAPA 58.01.01.200, Rules for the Control of Air Pollution in Idaho, and pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be constructed by this permit.

This permit (a) does not affect the title of the premises upon which the equipment is to be located; (b) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (c) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; (d) in no manner implies or suggests that the Department of Environmental Quality or its officers, agents, or employees, assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment.

This permit will expire if construction has not begun within two years of its issue date or if construction is suspended for one year.

This permit has been granted on the basis of design information presented with its application. Changes of design or equipment may require DEQ approval pursuant to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.200, et seq.

Toni Hardesty

**TONI HARDESTY, DIRECTOR
DEPARTMENT OF ENVIRONMENTAL QUALITY**

DATE ISSUED: June 14, 2006

Table of Contents

ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE	3
1. PERMIT TO CONSTRUCT SCOPE.....	4
2. FACILITY LIMITS.....	5
3. PERMIT TO CONSTRUCT GENERAL PROVISIONS	7

Acronyms, Units, and Chemical Nomenclature

AQCR	Air Quality Control Region
campaign year	the period starting with the first day of new beet crop processing and ending the day before the start of the next year's beet crop processing
DEQ	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
HAPs	hazardous air pollutants
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
NH₃	ammonia
PM	particulate matter
PM₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PTC	permit to construct
Rules	Rules for the Control of Air Pollution in Idaho
SIC	Standard Industrial Classification
SO₂	sulfur dioxide
T/yr	tons per year
UTM	Universal Transverse Mercator
VOC	volatile organic compound

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-060404

Permittee:	TASCO – MiniCassia Facility	Facility ID No. 067-00001	Date Issued:	June 14, 2006
Location:	Paul, Idaho			

1. PERMIT TO CONSTRUCT SCOPE***Purpose***

- 1.1 This PTC is a modification of PTC No. P-050421, issued December 15, 2005. The annual beet slice has been increased from 2,966,000 tons per campaign year to 3,200,000 tons per campaign year.
- 1.2 This PTC replaces PTC No. P-050421, issued December 15, 2005, the terms and conditions of which shall no longer apply.

Regulated Sources

- 1.3 Table 1.1 below lists all sources of emissions that are regulated in this PTC:

Table 1.1 REGULATED SOURCES OF EMISSIONS

Permit Section	Source Description	Emissions Control(s)
3	Sugar production facility	Various

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-060404

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2. FACILITY LIMITS**2.1 Process Description**

This facility is a sugar beet processing plant in which sugar beets are processed into refined sugar.

Emissions Limits**2.2 Opacity Limit**

Emissions from any stack, vent, or functionally equivalent opening associated with the processing of beets or the production of sugar, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625 (Rules for the Control of Air Pollution in Idaho). Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

Operating Requirements**2.3 Beet Throughput Limits**

- Throughput of beets to the facility shall not exceed 19,550 T/day.
- Throughput of beets to the facility shall not exceed 3,200,000 tons per campaign year.

2.4 Steam Production Limit

Steam production from the facility's boilers shall not exceed 1,830,000 thousand pounds of steam per campaign year (klb/yr).

2.5 Reasonable Control of Fugitive Emissions

All reasonable precautions shall be taken to prevent PM from becoming airborne as required in IDAPA 58.01.01.651. In determining what is a reasonable, consideration will be given to factors such as the proximity of dust-emitting operations to human habitations and/or activities and atmospheric conditions that might affect the movement of PM. Some of the reasonable precautions include, but are not limited to, the following:

- Use, where practical, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of lands;
- Application, where practical, of asphalt, oil, water or suitable chemicals to, or covering of dirt roads, material stockpiles, and other surfaces which can create dust;
- Installation and use, where practical, of hoods, fans and fabric filters or equivalent systems to enclose and vent the handling of dusty materials. Adequate containment methods should be employed during sandblasting or other operations;
- Covering, where practical, of open-bodied trucks transporting materials likely to give rise to airborne dusts;

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-060404

Permittee:	TASCO – MiniCassia Facility	Facility ID No. 067-00001	Date Issued:	June 14, 2006
Location:	Paul, Idaho			

- Paving of roadways and their maintenance in a clean condition, where practical; or
- Prompt removal of earth or other stored material from streets, where practical.

2.6 Air Pollution Emergency Rules

The permittee shall comply with the Air Pollution Emergency Rules in IDAPA 58.01.01.550-562.

Monitoring and Recordkeeping Requirements**2.7 Beet Throughput Monitoring**

The permittee shall monitor and record the daily and annual beet throughput to the facility to demonstrate compliance with Permit Condition 2.3. Annual throughput shall be determined by summing each daily throughput monthly, and then summing monthly throughput for the campaign year. A compilation of the most recent two years of records shall be kept onsite and shall be made available to DEQ representatives upon request.

2.8 Steam Production Monitoring

The permittee shall monitor and record the steam production monthly and annually to demonstrate compliance with Permit Condition 2.4. Annual steam production shall be determined by summing each monthly steam production for the campaign year. A compilation of the most recent two years of records shall be kept onsite and shall be made available to DEQ representatives upon request.

2.9 Fugitive Dust Monitoring

The permittee shall conduct a monthly facility-wide inspection of potential sources of fugitive emissions, during daylight hours and under normal operating conditions to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each fugitive emission inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (if observed); any corrective action taken in response to the fugitive emissions; and the date the corrective action was taken.

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-060404

Permittee:	TASCO – MiniCassia Facility	Facility ID No. 067-00001	Date Issued:	June 14, 2006
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3. PERMIT TO CONSTRUCT GENERAL PROVISIONS

1. The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the Rules for the Control of Air Pollution in Idaho. The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the Rules for the Control of Air Pollution in Idaho, and the Environmental Protection and Health Act, Idaho Code §39-101, et seq.
2. The permittee shall at all times (except as provided in the Rules for the Control of Air Pollution in Idaho) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.
3. The permittee shall allow the Director, and/or the authorized representative(s), upon the presentation of credentials:
 - To enter, at reasonable times, upon the premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit.
 - At reasonable times, to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and require stack compliance testing in conformance with IDAPA 58.01.01.157 when deemed appropriate by the Director.
4. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
5. The permittee shall furnish DEQ written notifications as follows in accordance with IDAPA 58.01.01.211.01 and 211.03:
 - A notification of the date of initiation of construction, within five working days after occurrence;
 - A notification of the date of completion/cessation of construction, within five working days after occurrence;
 - A notification of the anticipated date of initial start-up of the stationary source or facility not more than sixty days or less than thirty days prior to such date;
 - A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date; and
 - A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date
6. If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-060404

Permittee:	TASCO – MiniCassia Facility	Facility ID No. 067-00001	Date Issued:	June 14, 2006
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All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

Within 30 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

7. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.
8. In accordance with IDAPA 58.01.01.123, all documents submitted to DEQ, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.